

MORRISON & FOERSTER LLP
250 West 55th Street
New York, New York 10019
Telephone: (212) 468-8000
Facsimile: (212) 468-7900
Norman S. Rosenbaum
Jordan A. Wishnew

*Counsel for The Post-Effective Date
Debtors, The ResCap Liquidating Trust
and The ResCap Borrower Claims Trust*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

_____)	
In re:)	Case No. 12-12020 (MG)
)	
RESIDENTIAL CAPITAL, LLC, <u>et al.</u> ,)	Chapter 11
)	
Debtors.)	Jointly Administered
-----)	

**AMENDED¹ PROPOSED AGENDA FOR MATTERS SCHEDULED
TO BE HEARD ON MARCH 12, 2015 AT 10:00 A.M. (EST)**

Location of Hearing: United States Bankruptcy Court for the Southern District of New York,
Alexander Hamilton U.S. Custom House, Courtroom 501, One Bowling Green, New York, NY
10004-1408

I. ADJOURNED MATTER(S):

1. ResCap Liquidating Trust's Sixty-Seventh Omnibus Objection to Claims (No Liability - Underwriter Indemnification Claims) [Docket No. 6988]

Related Document(s):

- a. Notice of Adjournment of Hearing on Sixty-Seventh Omnibus Objection to Claims (No Liability - Underwriter Indemnification Claims) to July 30, 2014 at 10:00 a.m. [Docket No. 7081]

¹ Amended items appear in **bold**.

- b.** Notice of Adjournment of Hearing on Sixty-Seventh Omnibus Objection to Claims (No Liability - Underwriter Indemnification Claims) to August 13, 2014 at 10:00 a.m. [Docket No. 7238]
- c.** Notice of Adjournment of Hearing on Sixty-Seventh Omnibus Objection to Claims (No Liability - Underwriter Indemnification Claims) to August 26, 2014 at 10:00 a.m. [Docket No. 7281]
- d.** Notice of Adjournment of Hearing on Sixty-Seventh Omnibus Objection to Claims (No Liability Underwriter Indemnification Claims) to September 30, 2014 at 10:00 a.m. [Docket No. 7334]
- e.** Notice of Adjournment of Hearing on Sixty-Seventh Omnibus Objection to Claims (No Liability - Underwriter Indemnification Claims) to October 30, 2014 at 10:00 a.m. [Docket No. 7478]
- f.** Notice of Adjournment of Hearing on Sixty-Seventh Omnibus Objection to Claims (No Liability - Underwriter Indemnification Claims) to December 2, 2014 at 10:00 a.m. [Docket No. 7606]
- g.** Notice of Adjournment of Hearing on Sixty-Seventh Omnibus Objection to Claims (No Liability Underwriter Indemnification Claims) to December 18, 2014 at 10:00 a.m. [Docket No. 7719]
- h.** Notice of Withdrawal of ResCap Liquidating Trusts Sixty-Seventh Omnibus Objection to Claims (No Liability - Underwriter Indemnification Claims) Solely With Respect To Certain Claims [Docket No. 7721]
- i.** Notice of Adjournment of Hearing on Sixty-Seventh Omnibus Objection to Claims (No Liability - Underwriter Indemnification Claims) to January 14, 2015 at 10:00 a.m. [Docket No. 7792]
- j.** Notice of Adjournment of Hearing on Sixty-Seventh Omnibus Objection to Claims (No Liability - Underwriter Indemnification Claims) to February 11, 2015 at 10:00 a.m. [Docket No. 7903]
- k.** Notice of Adjournment of Hearing on Sixty-Seventh Omnibus Objection to Claims (No Liability - Underwriter Indemnification Claims) to March 12, 2015 at 10:00 a.m. [Docket No. 7996]
- l.** Notice of Adjournment of Hearing on Sixty-Seventh Omnibus Objection to Claims (No Liability - Underwriter Indemnification Claims) to March 31, 2015 at 10:00 a.m. [Docket No. 8124]
- m.** Notice of Adjournment of Hearing on Sixty-Seventh Omnibus Objection to Claims (No Liability - Underwriter Indemnification Claims) to April 30, 2015 at 10:00 a.m. [Docket No. 8233]

Response(s): None.

Status: The hearing on this matter has been adjourned to April 30, 2015.

2. ResCap Borrower Claims Trust's Sixty-Ninth Omnibus Objection to Claims (No Liability Borrower Claims) [Docket No. 7188]

Related Document(s):

- a. Notice of Adjournment of Hearing on ResCap Borrower Claims Trust's Sixty-Ninth Omnibus Objection to Claims (No Liability Borrower Claims) with Respect to Certain Claimants [Docket No. 7402]
- b. Notice of Adjournment of Hearing on ResCap Borrower Claims Trust's Sixty-Ninth Omnibus Objection to Claims (No Liability Borrower Claims) Solely as it Relates to the Claims Filed by (I) Maurice Sharpe (Claim No. 2079) and (II) Otis Collier (Claim No. 5066) to October 30, 2014 at 10:00 a.m. (Prevailing Eastern Time) [Docket No. 7554]
- c. Notice of Adjournment of Hearing on ResCap Borrower Claims Trust's Sixty-Ninth Omnibus Objection to Claims (No Liability Borrower Claims) Solely as it Relates to the Claims Filed by (I) Maurice Sharpe (Claim No. 2079) and (II) Otis L. Collier (Claim No. 5066) to November 20, 2014 at 10:00 a.m. (Prevailing Eastern Time) [Docket No. 7677]
- d. Notice of Adjournment of Hearing on ResCap Borrower Claims Trust's Sixty-Ninth Omnibus Objection to Claims (No Liability Borrower Claims) Solely as it Relates to the Claims Filed by (I) Maurice Sharpe (Claim No. 2079) and (II) Otis L. Collier (Claim No. 5066) to December 18, 2014 at 10:00 a.m. (Prevailing Eastern Time) [Docket No. 7753]
- e. Notice of Adjournment of Hearing on ResCap Borrower Claims Trust's Sixty-Ninth Omnibus Objection to Claims (No Liability Borrower Claims) Solely as it Relates to the Claims Filed by (I) Maurice Sharpe (Claim No. 2079) and (II) Otis L. Collier (Claim No. 5066) to January 14, 2015 at 10:00 a.m. (Prevailing Eastern Time) [Docket No. 7869]
- f. Notice of Adjournment of Hearings on ResCap Borrower Claims Trust's Sixty-Ninth Omnibus Objection to Claims (No Liability Borrower Claims) Solely as it Relates to the Claims Filed by (I) Otis L. Collier (Claim No. 5066) and (II) Maurice Sharpe (Claim No. 2079) [Docket No. 7969]
- g. Notice of Adjournment of Hearing on ResCap Borrower Claims Trust's Sixty-Ninth Omnibus Objection to Claims (No Liability Borrower Claims) Solely as it Relates to the Claim Filed by Maurice Sharpe (Claim No. 2079) to April 16, 2015 at 10:00 a.m. (Prevailing Eastern Time) [Docket No. 8161]

Response(s): None.

Status: The hearing on this matter, solely as it relates to the claim filed by Maurice Sharpe (Claim No. 2079), has been adjourned to April 16, 2015.

3. ResCap Borrower Claims Trust's Objection to Proof of Claim No. 5257 Filed by Kenneth Taggart [Docket No. 7847]

Related Document(s):

- a. Letter from Kenneth Taggart Requesting 30-Day Extension to File Response [Docket No. 7921]
- b. Notice of Adjournment of Hearing on ResCap Borrower Claims Trust's Objection to Proof of Claim No. 5257 Filed by Kenneth Taggart to March 12, 2015 at 10:00 a.m. (Prevailing Eastern Time) [Docket No. 7942]
- c. Notice of Adjournment of Hearing on ResCap Borrower Claims Trust's Objection to Proof of Claim No. 5257 Filed by Kenneth Taggart to March 31, 2015 at 10:00 a.m. (Prevailing Eastern Time) [Docket No. 8102]

Response(s):

- a. Kenneth Taggart's Answer to Opposition of Claims Trust's to Claim No. 5257 and Leave to File Amended Claim [Docket No. 8177]

Status: The hearing on this matter has been adjourned to March 31, 2015.

4. ResCap Borrower Claims Trust's Objection to Claim No. 2397 Filed by John Satterwhite [Docket No. 7990]

Related Document(s):

- a. Notice of Adjournment of Hearing on ResCap Borrower Claims Trust's Objection to Claim No. 2397 Filed by John Satterwhite to March 12, 2015 at 10:00 a.m. (Prevailing Eastern Time) [Docket No. 8056]
- b. Notice of Adjournment of Hearing on ResCap Borrower Claims Trust's Objection to Claim No. 2397 Filed by John Satterwhite to March 31, 2015 at 10:00 a.m. (Prevailing Eastern Time) [Docket No. 8148]

Response(s): None.

Status: The hearing on this matter has been adjourned to March 31, 2015.

II. RESOLVED MATTER(S):

1. Motion of Hedeya Haroutunian for Relief from the Automatic Stay Under 11 U.S.C. § 362 [Docket No. 7537]

Related Document(s):

- a. Notice of Adjournment of Hearing on Motion of Hedeya Haroutunian for Relief from the Automatic Stay Under 11 U.S.C. § 362 to November 20, 2014 at 10:00 a.m. (Prevailing Eastern Time) [Docket No. 7661]
- b. Notice of Adjournment of Hearing on Motion of Hedeya Haroutunian for Relief from the Automatic Stay Under 11 U.S.C. § 362 to January 14, 2015 at 10:00 a.m. (Prevailing Eastern Time) [Docket No. 7746]
- c. Notice of Adjournment of Hearing on Motion of Hedeya Haroutunian for Relief from the Automatic Stay Under 11 U.S.C. § 362 to February 23, 2015 at 10:00 a.m. [Docket No. 7956]
- d. Amended Notice of Adjournment of Hearing on Motion of Hedeya Haroutunian for Relief from the Automatic Stay Under 11 U.S.C. § 362 to February 25, 2015 at 10:00 a.m. [Docket No. 7968]
- e. Notice of Adjournment of Hearing on Motion of Hedeya Haroutunian for Relief from the Automatic Stay Under 11 U.S.C. § 362 to March 12, 2015 at 10:00 a.m. (Prevailing Eastern Time) [Docket No. 8142]
- f. **Notice of Withdrawal of Motion of Hedeya Haroutunian for Relief from the Automatic Stay of 11 U.S.C. § 362 [Docket No. 8286]**

Response(s): None.

Status: This matter has been resolved and the motion has been withdrawn. No hearing is required.

III. CONTESTED NON-CLAIMS MATTER(S):

- 1. Amended Motion for Relief from the Automatic Stay Regarding "RFC" and "Homecomings Financial" to Pursue Discovery Filed by Ronald P. Gillis [Docket No. 7785]

Related Document(s):

- a. Motion to Allow Waiver of Fee For Amended Motion for Relief from Stay [Docket No. 7786]
- b. Motion of Ronald P. Gillis to Strike ResCap Liquidating Trust's Objection as Untimely and Irrelevant [Docket No. 8246]
- c. Motion of Ronald P. Gillis to Accept Movant's Motion to Strike ResCap Liquidating Trust's Objection as Untimely and Irrelevant as Timely Filed and Request for Oral Argument on March 12, 2015 [Docket No. 8248]

- d. Notice of Hearing on Amended Motion for Relief from the Automatic Stay Regarding "RFC" and "Homecomings Financial" to Pursue Discovery Filed by Ronald P. Gillis [Docket No. 8257]

Response(s):

- a. The ResCap Liquidating Trust's Objection to Amended Motion for Relief of Automatic Stay Regarding "RFC" and "Homecomings Financial" to Pursue Discovery [Docket No. 8136]

Status: The hearing on this matter will be going forward.

- 2. Order to Show Cause Why Court Should Not Determine Tom Franklin to Be a Vexatious Litigator and Either Impose Sanctions or Issue an Injunction Enjoining Future Filings by Franklin [Docket No. 8074]

Related Document(s):

- a. Notice of Appeal of Tom Franklin [Docket No. 8273]
- b. Application of Tom Franklin to Proceed *In Forma Pauperis* regarding Notice of Appeal [Docket No. 8274]

Response(s):

- a. Response of Tom Franklin to Order to Show Cause [Docket No. 8147]
- b. Response of Tom Franklin in Opposition to Court's Request for an Order Issuing an Injunction as Bias [Docket No. 8242]
- c. Response of Tom Franklin in Opposition to Court's Request for an Order Issuing an Injunction as Bias – Injunction Motion Ought to be Stayed Until Appeal is Heard [Docket No. 8244]
- d. Response of Tom Franklin Opposition to Court's Request for an Order Issuing an Injunction as Bias – Injunction Motion Ought to be Stayed Until Appeal is Heard and Opposition to Court's Show Cause Recommendations [Docket No. 8245]
- e. Response of The ResCap Liquidating Trust and The ResCap Borrower Claims Trust to Order to Show Cause Why Court Should Not Determine Tom Franklin To Be a Vexatious Litigator and Either Impose Sanctions or Issue an Injunction Enjoining Future Filings by Franklin [Docket No. 8255]

Status: The hearing on this matter will be going forward.

3. Motion of the ResCap Liquidating Trust for Final Decree Closing Certain Jointly Administered Chapter 11 Cases [Docket No. 8107]

Related Document(s): None.

Response(s):

- a. Michael E. Boyd's Amended Opposition to Motion of the ResCap Liquidating Trust for Final Decree Closing Certain Jointly Administered Chapter 11 Cases [Docket No. 8191]
- b. Felix O. Abu's Opposition to Motion of the ResCap Liquidating Trust for Final Decree Closing Certain Jointly Administered Chapter 11 Cases [Docket No. 8203]
- c. Abosede Eboweme's Opposition to Motion of the ResCap Liquidating Trust for Final Decree Closing Certain Jointly Administered Chapter 11 Cases [Docket No. 8204]

Reply:

- a. Omnibus Reply of the ResCap Liquidating Trust in Further Support of its Motions (I) for Final Decree Closing Certain Jointly Administered Chapter 11 Cases and (II) for Entry of an Order Establishing Procedures Enforcing Injunctive Provisions of Plan and Confirmation Order [Docket No. 8272]

Status: The hearing on this matter will be going forward.

4. Motion for Entry of an Order Establishing Procedures Enforcing Injunctive Provisions of Plan and Confirmation Order [Docket No. 8158]

Related Document(s): None.

Response(s):

- a. Ronald P. Gillis' Timely Motion in Opposition to Debtors' Motion for Entry of an Order Establishing Procedures Enforcing Injunctive Provisions of Plan and Confirmation Order [Docket No. 8243]
- b. CitiMortgage, Inc., Iraide Peruchi, and Matthew and Alexis Freitas' Objection to Debtors' Motion for Entry of Order Establishing Procedures Enforcing Injunctive Provisions of Plan [Docket No. 8256]
 - (i) **Affirmation in Further Support of CitiMortgage, Inc., Iraide Peruchi, and Matthew and Alexis Freitas' Objection to Debtors' Motion for Entry of Order Establishing Procedures Enforcing Injunctive Provisions of Plan [Docket No. 8284]**

- c. Sepideh Cirino's Opposition to ResCap Liquidating Trust's Motion for Entry of an Order Establishing Procedures Enforcing Injunctive Procedures of Plan and Confirmation Order [Docket No. 8281]

Reply:

- a. Omnibus Reply of the ResCap Liquidating Trust in Further Support of its Motions (I) for Final Decree Closing Certain Jointly Administered Chapter 11 Cases and (II) for Entry of an Order Establishing Procedures Enforcing Injunctive Provisions of Plan and Confirmation Order [Docket No. 8272]

Status: The hearing on this matter will be going forward.

IV. ADVERSARY PROCEEDING MATTERS

Residential Capital, LLC v. Allstate Ins. Co. (Adv. Proc. No. 12-01671 (MG))

1. Motion of the ResCap Liquidating Trust to Voluntarily Dismiss Adversary Proceeding [Docket No. 110]

Related Document(s): None.

Response(s): None.

Status: The hearing on this matter will be going forward.

V. CLAIMS OBJECTION(S) GOING FORWARD:

1. ResCap Liquidating Trust's Eighty-Third Omnibus Objection to Claims (No Liability Claims) [Docket No. 8100]

Related Document(s):

- a. Notice of Withdrawal of ResCap Liquidating Trust's Eighty-Third Omnibus Objection to Claims Solely with respect to Claim No. 5262 Filed By JPMorgan Chase Bank, N.A. [Docket No. 8228]

Response(s): None.

Status: The hearing on this matter will be going forward.

2. ResCap Liquidating Trust's Objection to Proof of Claim No. 788 filed by Petra Finance, LLC [Docket No. 8104]

Related Document(s): None.

Response(s): None.

Status: The hearing on this matter will be going forward.

3. ResCap Borrower Claims Trust's Sixty-Ninth Omnibus Objection to Claims (No Liability Borrower Claims) [Docket No. 7188]

Related Document(s):

- a.** Notice of Adjournment of Hearing on ResCap Borrower Claims Trust's Sixty-Ninth Omnibus Objection to Claims (No Liability Borrower Claims) with Respect to Certain Claimants [Docket No. 7402]
- b.** Notice of Adjournment of Hearing on ResCap Borrower Claims Trust's Sixty-Ninth Omnibus Objection to Claims (No Liability Borrower Claims) Solely as it Relates to the Claims Filed by (I) Maurice Sharpe (Claim No. 2079) and (II) Otis Collier (Claim No. 5066) to October 30, 2014 at 10:00 a.m. (Prevailing Eastern Time) [Docket No. 7554]
- c.** Notice of Adjournment of Hearing on ResCap Borrower Claims Trust's Sixty-Ninth Omnibus Objection to Claims (No Liability Borrower Claims) Solely as it Relates to the Claims Filed by (I) Maurice Sharpe (Claim No. 2079) and (II) Otis L. Collier (Claim No. 5066) to November 20, 2014 at 10:00 a.m. (Prevailing Eastern Time) [Docket No. 7677]
- d.** Notice of Adjournment of Hearing on ResCap Borrower Claims Trust's Sixty-Ninth Omnibus Objection to Claims (No Liability Borrower Claims) Solely as it Relates to the Claims Filed by (I) Maurice Sharpe (Claim No. 2079) and (II) Otis L. Collier (Claim No. 5066) to December 18, 2014 at 10:00 a.m. (Prevailing Eastern Time) [Docket No. 7753]
- e.** Notice of Adjournment of Hearing on ResCap Borrower Claims Trust's Sixty-Ninth Omnibus Objection to Claims (No Liability Borrower Claims) Solely as it Relates to the Claims Filed by (I) Maurice Sharpe (Claim No. 2079) and (II) Otis L. Collier (Claim No. 5066) to January 14, 2015 at 10:00 a.m. (Prevailing Eastern Time) [Docket No. 7869]
- f.** Notice of Adjournment of Hearings on ResCap Borrower Claims Trust's Sixty-Ninth Omnibus Objection to Claims (No Liability Borrower Claims) Solely as it Relates to the Claims Filed by (I) Otis L. Collier (Claim No. 5066) and (II) Maurice Sharpe (Claim No. 2079) [Docket No. 7969]
- g.** Notice of Adjournment of Hearing on ResCap Borrower Claims Trust's Sixty-Ninth Omnibus Objection to Claims (No Liability Borrower Claims) Solely as it Relates to the Claim Filed by Otis L. Collier (Claim No. 5066) to March 12, 2015 at 10:00 a.m. (Prevailing Eastern Time) [Docket No. 8150]

Response(s):

- a. Response and Opposition of Otis L. Collier, Jr. to ResCap Borrower Claims Trust's Sixty-Ninth Omnibus Objection to Claims (No Liability Borrower Claims) [Docket No. 7351]
- b. Declaration of Otis L. Collier, Jr. [in Support of Response and Opposition of Otis L. Collier, Jr. to ResCap Borrower Claims Trust's Sixty-Ninth Omnibus Objection to Claims (No Liability Borrower Claims)] [Docket No. 7351]
- c. Partial Withdrawal of Response and Opposition of Claimant, Otis L. Collier, Jr., to ResCap Borrower Claims Trust's Sixty-Ninth Omnibus Objection to Claims and Request for Opportunity for Discovery and Evidentiary Hearing [Docket No. 8263]

Reply:

- a. ResCap Borrower Claims Trust's Reply in Support of Its Sixty-Ninth Omnibus Objection to Claims (No Liability Borrower Claims) as to Claim No. 5066 Filed by Otis Collier [Docket No. 8251]

Status: The hearing on this matter, solely as it relates to the claim filed by Otis L. Collier (Claim No. 5066), will be going forward.

- 4. The ResCap Liquidating Trust's Seventy-Ninth Omnibus Claims Objection (Purported Administrative Claims) [Docket No. 7841]

Related Document(s):

- a. *Ex Parte* Request of Martha S. Panaszewicz for Extension of Time Within Which to Respond to The ResCap Liquidating Trust's Seventy-Ninth Omnibus Claims Objection (Purported Administrative Claims) [Docket No. 7928]
- b. Notice of Adjournment of Hearing on the ResCap Liquidating Trust's Seventy-Ninth Omnibus Claims Objection (Purported Administrative Claims) Solely as it Relates to the Claim Filed by Martha S. Panaszewicz (Claim No. 7466) to February 11, 2015 at 10:00 a.m. (Prevailing Eastern Time) [Docket No. 7951]
- c. Scheduling Order for the ResCap Liquidating Trust's Seventy-Ninth Omnibus Claims Objection (Purported Administrative Claims) Solely as it Relates to Claim No. 7466 Filed by Martha S. Panaszewicz [Docket No. 8159]

Response(s):

- a. Response of Martha Panaszewicz in Opposition to ResCap Liquidating Trust's Seventy-Ninth Omnibus Claims Objection [Docket No. 8201]

Reply:

- a. The ResCap Liquidating Trust's Reply in Support of its Seventy-Ninth Omnibus Claims Objection (Purported Administrative Claims) Solely with Respect to Claim No. 7466 Filed by Martha S. Panaszewicz [Docket No. 8258]

Status: The hearing on this matter, solely as it relates to the claim filed by Martha S. Panaszewicz (Claim No. 7466), will be going forward.

- 5. Objection of the ResCap Liquidating Trust to Claim Numbers 2385, 2386, 2387, 2388 and 2389 Filed by Duncan K. Robertson [Docket No. 8072]

Related Document(s):

- a. Duncan K. Robertson's Notice of Filing of a Third-Party Action Against Residential Funding Company, LLC [Docket No. 8239]
- b. Duncan K. Robertson's Notice of Filing of Appeal in Ninth Circuit [Docket No. 8240]

Response(s):

- a. Duncan K. Robertson's (i) Response to Objection to Claim Numbers 2385, 2386, 2387, 2388 and 2389; (ii) Request to Stay Objections to Claims; and (iii) Notice of Intent to File Motion for Relief from Stay [Docket No. 8238]

Reply:

- a. Reply in Support of Objection of the ResCap Liquidating Trust to Claim Numbers 2385, 2386, 2387, 2388 and 2389 Filed by Duncan K. Robertson [Docket No. 8279]

Status: The hearing on this matter will be going forward.

Dated: March 11, 2015
New York, New York

/s/ Norman S. Rosenbaum
Norman S. Rosenbaum
Jordan A. Wishnew
MORRISON & FOERSTER LLP
250 West 55th Street
New York, New York 10019
Telephone: (212) 468-8000
Facsimile: (212) 468-7900

*Counsel for The Post-Effective Date
Debtors, The ResCap Liquidating Trust
and The ResCap Borrower Claims Trust*